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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Ms. J.P., et al.,

Plaintiffs,

vs.

WILLIAM P. BARR, et al.,

Defendants.

Case No. 2:18-CV-06081-JAK-SK

**NOTICE OF MOTION AND JOINT  
MOTION FOR PROTECTIVE  
ORDER**

Assigned to: Hon. John A. Kronstadt  
and the Hon. Steve Kim

Date: February 13, 2020

Time: 1:30 p.m.

Place: United States Courthouse  
350 W. First Street  
Courtroom 10B  
Los Angeles, CA 90012

Action Filed: July 12, 2018

Discovery Cutoff Date: October 5, 2020

Pretrial Conference: TBA

Trial Date: April 20, 2021

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23 \* *Admitted pro hac vice*

24 \*\* *Institution listed for identification purposes only*

PLEASE TAKE NOTICE that on February 13, 2020 at 1:30 p.m., or as soon thereafter as the matter may be heard, in the above-mentioned court at the United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 10B, before the Honorable John A. Kronstadt, Plaintiffs Ms. J.P., Ms. J.O., and Ms. R.M., on behalf of themselves and all others similarly situated (“Plaintiffs”) and Defendants William P. Barr, Kevin K. McAleenan,<sup>1</sup> the Department of Homeland Security, United States Immigration and Customs Enforcement, United States Customs and Border Protection, Alex M. Azar II, the Department of Health and Human Services, Jonathan H. Hayes, Office of Refugee Resettlement, David Marin, Lisa Von Nordheim, Marc Moore, and Lowell Clark (collectively “Defendants”) will and hereby jointly do respectfully move for entry of a Protective Order. Plaintiffs move for an order entering their version of a Protective Order, attached as Exhibit B to the Declaration of Kevin M. Fee in Support of Plaintiffs’ Motion to Compel (“Fee Decl.”), filed concurrently herewith. Defendants move for an order entering their version of a Protective Order attached as Exhibit C to the Fee Declaration. Per the Court’s Order, a redline between the parties’ proposed versions is attached as Exhibit D to the Fee Declaration.

As explained more fully in the Joint Stipulation and Declaration of Kevin M. Fee filed concurrently herewith, the parties met and conferred prior to the filing of this motion pursuant to Local Rule 37 and Federal Rule of Civil Procedure 37 but were unable to resolve their dispute and thus require the Court’s assistance. *See* Fee Decl., filed concurrently herewith. The parties’ arguments regarding the differences between the two versions of the Protective Order are also laid out in the Joint Stipulation. This Motion is based upon this Notice of Motion, the Joint Stipulation of Plaintiffs and Defendants pursuant to Local Rule 37-2, the declarations of counsel filed herewith, all

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<sup>1</sup> Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Acting Secretary of Homeland Security Chad F. Wolf is substituted for the former Acting Secretary Kevin K. McAleenan.

1 pleadings and papers on file in this action, and upon other such evidence and  
2 argument as may be presented to the Court at or before hearing on this Motion.

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5 Date: January 31, 2020

SIDLEY AUSTIN LLP

6 By: /s/ Amy P. Lally

7 Amy P. Lally

8 Ellyce R. Cooper

9 *Attorneys for Plaintiffs*

10  
11 Date: January 31, 2020

UNITED STATE DEPARTMENT OF  
JUSTICE, OFFICE OF  
IMMIGRATION LITIGATION

12 By: /s/ Nicole N. Murley

13 Nicole N. Murley

14 Lindsay M. Vick

15 *Attorneys for Defendants*

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18  
19 **FILER'S ATTESTATION**

20 Pursuant to Local Rule 5-4.3.4(a)(2) of the Central District of California, I attest  
21 that I have concurrence in the filing of this document.

22  
23 By: /s/ Amy P. Lally

1 **CERTIFICATE OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the  
3 age of 18 years and not a party to the within action. My business address is 1999  
4 Avenue of the Stars, 17th Floor, Los Angeles, California 90067.

5 On January 31, 2020, I served the foregoing document(s) described as  
6 **NOTICE OF MOTION AND JOINT MOTION FOR PROTECTIVE ORDER** on  
7 all interested parties in this action by the method described below:

8 I electronically filed the foregoing with the Clerk of District Court using its  
9 CM/ECF system, which electronically provides notice.

10 I declare under penalty of perjury that the foregoing is true and correct.

11  
12 /s/ Amy P. Lally  
13 Amy P. Lally  
14 Attorney for Plaintiffs  
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